



IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

GINGER HOLT, M.D.,

Plaintiff,

Case No. 3:23-cv-00179

v.

Judge Crenshaw  
Magistrate Judge Frensley

JURY DEMAND

VANDERBILT UNIVERSITY and  
VANDERBILT UNIVERSITY MEDICAL  
CENTER,

Defendants.

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**MOTION TO FILE AMENDED COMPLAINT**

COMES NOW Plaintiff Ginger Holt, M.D., respectfully moves to amend her Complaint (ECF 1). Plaintiff submits the following as good cause shown:

1. The amendment deadline has not passed, it is December 1, 2023. (ECF 22, ¶ H).
2. Defendant VU filed a motion to dismiss (ECF 16, 17) under Rule 12(b)(6) alleging perceived pleading deficiencies. The amendment will cure any perceived deficiencies and as such, promote judicial efficiency.
3. Defendant's counsel indicated that under Rule 15, Plaintiff did not need its consent, but would not agree to confirm whether the motion to amend was opposed.
4. Plaintiff conferred with Defendant's counsel pursuant to Local Rule 7.01 prior to filing the motion.

Accordingly, Plaintiff requests the attached Amended Complaint be filed.

Respectfully submitted,

*/s Heather Moore Collins*  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been furnished to via the Court's electronic filing system on May 23, 2023 to the following:

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*/s Heather Moore Collins*  
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